Name and Address of Company

Ciba-Geigy Corp.
180 Mill Street
Cranston, RI 02905

Date of Inspection

July 13, 1984

State Enforcement History

August 5, 1980	-	Inspection by RIDEM
December 17, 1980	-	Inspection by RIDEM
January 23, 1981	-	Inspection by RIDEM
February 11, 1981	-	Inspection by RIDEM
February 25, 1981	-	Inspection by RIDEM. Deficiencies in manifesting sulfuric acid and in storage area found. Waiver for acid manifesting was requested.
April 20, 1981	-	Status assessment by RIDEM
March , 1982	-	Air screening study in plant neighborhood, in response to complaints, by EPA/RIDEM.
June 20, 1982	-	Inspection by RIDEM

Recommended Enforcement Action

RIDEM: Send Letter of Deficiency (LOD)

State Coordination

Expect copy of LOD from RIDEM (Julie Miller)

SUBJECT: RCRA Industrial Survey Report - Ciba-Geigy Corporation - Cranston, Rhode Island

FROM: Michael J. O'Brien, Environmental Engineer, CT/RI Waste Programs Section

TO: Richard C. Boynton, Chief, CT/RI Waste Programs Section

I. GENERAL INFORMATION

A. Facility Name: Ciba-Geigy Corporation
180 Mill Street
Cranston, Rhode Island
(401)467-8200

B. RCRA Contact: Mr. Ronald Mikucki

C. Responsible Official: Dr. James E. Crowley

D. Date of Inspection: July 13, 1984

E. Purpose of Inspection: Joint EPA/RIDEM RCRA facilities interim status performance evaluation.

F. Persons Participating in the Inspection:

U.S. EPA - Michael J. O'Brien
RI DEM - Julie A. Miller
Ciba-Geigy - Dr. James E. Crowley
Mr. Ronald Mikucki

II. RCRA REPORTING INFORMATION REQUIREMENTS

A. Facility I.D. Number: RID001194323

B. Type of Operation: Storage

C. Type of Operation for Which Notification has been Received: Treatment, Storage and/or Disposal and Transportation

D. Date of Notification: August 6, 1980

E. Date of Submittal of Part A to EPA: November 18, 1980

F. Date Part B was Called by EPA: March 9, 1982

G. Date Part B was Received: September 14, 1982

III. SOURCE DESCRIPTION

The Ciba-Geigy plant is located in an industrial area adjacent to a solid residential area of single family houses. The plant straddles the Pawtuxet River, which is the boundary between the cities of Cranston and Warwick in this area.

This plant manufactures nearly 150 fine organic chemicals and pharmaceuticals from approximately 500 raw materials by batch processing. It employs organic synthesis, crystallization, distillation, filtration, drying and grinding processes. It generates about 70 waste streams classified as hazardous pursuant to 40 CFR Part 261. These wastes are mostly listed, chlorinated and unchlorinated solvents and unlisted, ignitable solvents and other chemicals. A few of the wastes are hazardous due to their corrosivity characteristic.

Ciba-Geigy stores hazardous wastes in 55-gallon steel drums and in a 6000-gallon steel tank prior to shipment for disposal or treatment. This facility ships over four million pounds of hazardous waste each year, most of it by 10,000-gallon railroad tank car to one of Ciba-Geigy's southern facilities for incineration. The container storage area; with an asphalt base and concrete curbs and completely enclosed by a chain link fence, has a capacity for 768 55-gallon drums (42,240 gallons) of hazardous waste.

IV. GENERAL OBSERVATIONS

The hazardous waste facilities were well managed according to RCRA interim status regulations contained in 40 CFR §265. The government inspectors examined the known active hazardous waste sites and toured other major facilities on the property to survey for other possible hazardous waste occurences. We inspected most of the pharmaceutical production building and viewed the principle parts of the wastewater treatment plant and the paved yards. The inspectors found three drums of hazardous waste on a pallet in the production building, but were assured by the production superintendent that satellite accumulations of such waste was moved to the formal storage area almost immediately after completion of a pallet, within a few days of the beginning of collection. This EPA inspector also inquired about the time that any railroad tank car containing hazardous waste remained parked on the rail spur within the plant. Rail tank cars can be filled by two 5,000-gallon dumps from the waste solvent collection tank and cars can move within a week. Therefore, any tank car is equivalent to a hazardous waste transfer station.

The only discrepancy found in the RCRA hazardous waste management was the inadequacy of a label on a 55-gallon drum of waste chloroform in the container storage area. The drum had no label with "Hazardous Waste" in large letters. Another drum, with all labels painted over was identified as non-hazardous waste by the environmental technician, Mr. Bruno Ganganese.

Before and after the inspection, the inspectors were invited to meet with Mr. Claude H. Trottier, the plant manager. At the initial meeting, this EPA inspector queried Mr. Trottier about early closure of the hazardous waste facilities. He indicated that these facilities would be needed as long as the commercial production facilities are operating, until the end of 1985. At the exit conference, we notified Mr. Trottier about the minor, labeling violation and reminded him as we had Dr. Crowley and Mr. Mikucki, that the closure cost estimate needed updating by its anniversary date, August 5.

V. SUMMARY OF VIOLATIONS

There was only one, Class III violation at this RCRA interim status facility. The violation was inadequate labelling of one drum of hazardous waste.